## UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF NEW YORK

NATIONAL RIFLE ASSOCIATION OF AMERICA.

Plaintiff,

**NOTICE OF MOTION** 

-against-

1:18-CV-0566 TJM/CFH

ANDREW CUOMO, both individually and in his official capacity; MARIA T. VULLO, both individually and in her official capacity; and THE NEW YORK STATE DEPARTMENT OF FINANCIAL SERVICES.

Defendants.

PLEASE TAKE NOTICE that upon the annexed affirmation of William A. Scott; the accompanying memorandum of law; and upon all prior proceedings, Defendants, on May 16, 2019 at 9:30 a.m., or as soon thereafter as counsel can be heard, will make a motion before the Honorable Christian F. Hummel, at the United States District Court, Northern District of New York, Albany, New York, pursuant to Rule 60(b), of the Federal Rules of Civil Procedure, for reconsideration of the Court's prior Order at Docket Number 89, granting the Plaintiff's Motion for Expedited Discovery, to the extent that said motion sought the deposition of Defendant Maria T. Vullo together with such other or further relief as may be just.

Dated: Albany, New York April 3, 2019

**LETITIA JAMES** 

Attorney General of the State of New York Attorney for Defendants The Capitol

Albany, New York 12224-0341

By: s/ William a. Scott

William A. Scott

Assistant Attorney General, of Counsel

Bar Roll No. 512434

Telephone: (518) 776-2255

Email: William.Scott@ag.ny.gov

TO: Sarah Rogers, Esq. Stephanie L. Gase, Esq. William A. Brewer, Esq. Brewer Attorneys & Counselors 750 Lexington Avenue, 14th Flr. New York, NY 10022

> Charles J. Cooper, Esq. J. Joel Alicea, Esq. Michael W. Kirk, Esq. Cooper & Kirk, PLLC 1523 New Hampshire Ave., NW Washington, DC 20036